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1 2	Jack P. Burden, Esq. Nevada State Bar No. 6918 BACKUS, CARRANZA & BURDEN		
3	3050 South Durango Drive Las Vegas, NV 89117		
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6	Attorneys for Defendant, THE VONS COMPANIES, INC		
7	UNITED STATES DISTRICT COURT		
8	DISTRICT OF NEVADA		
9	FRANCINE SCOLARO, an individual,) Case No. 2:17-cv-01979-JAD-VCF	
10	Plaintiff,))	
11	VS.) STIPULATION AND ORDER) TO EXTEND DISCOVERY	
12 13	THE VONS COMPANIES, INC.; DOES I through X,; and ROE CORPORATIONS XI through XX, inclusive,) (FIRST REQUEST)))	
14	Defendants.))	
15	COME NOW, Plaintiff FRANCINE SCOLARO, by and through her counsel Steven		
16	Mack, Esq. of Black & Lobello and Defendant, The Vons Companies, Inc., by and through its		
17	counsel Jack P. Burden, Esq. of Backus, Carranza & Burden, and hereby stipulate to the extension		
18 19	of all remaining discovery deadlines by sixty (60) days. Therefore, the parties propose the		
20	following revised discovery plan:		
21	DISCOVERY COMPLETED TO DATE		
22	The parties have exchanged initial and disclosures of documents and the names of		
23	individuals with knowledge of the facts pertaining to the claims set forth in this matter. Defendant		
24	has propounded written discovery requests including interrogatories and requests for production.		
	Defendant has taken Ms. Scolaro's deposition.		

DISCOVERY TO BE COMPLETED

Plaintiffs intend propound discovery to Defendant and intend to disclose liability and damages experts. Defendant intend to disclose liability and damages experts. Plaintiff seeks to perform a site inspection of the subject store. Defendant further seeks to depose Plaintiff's medical providers and experts thereafter. Plaintiff intends to depose the Defendant's "PMK" as well as the only known percipient witness. Defendant intends to have Plaintiff undergo a Independent Medical Examination. Plaintiff intends to take the deposition of Defendants' experts.

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REASONS FOR EXTENSION TO COMPETE DISCOVERY

Despite the good faith efforts of the parties to comply with the Court's discovery deadlines, both parties have scheduling conflicts and need additional time for additional medical records, Independent Medical Examination, and expert designations. This request is made in good faith, not for the purpose of delay.

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PROPOSED NEW DISCOVERY DEADLINES

Expert Disclosure Deadline:

Currently:

2/23/18

Proposed:

5/25/18

Interim Status Report:

Currently:

1/26/18

Proposed:

5/25/18

Rebuttal Expert Disclosure Deadline:

Currently:

3/23/18

22 Proposed:

6/25/18

Discovery Deadline:

Currently: **Proposed:**

5/25/18

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7/24/18

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1	Deadline to File Dispositive Motions:	
2	Currently: 6/22/18	
	Proposed: -9/24/18 8-24-2018	
3	Pre-Trial Order Deadline:	
4	Currently: 7/23/18 9-24-2018	
5	Proposed: 10/23/18 9-24-2016	
6	DATED: this <u>23rd</u> day of January, 2018 DATED: this <u>23rd</u> day of January, 2018	
7	Black & Lobello Backus, Carranza & Burden	
8	By: /s/ Steven Mack	
9	By: 1st Jack P. Buraen	
10	10777 West Twain Avenue #300 3050 South Durango Drive	
	Las Vegas, NV 89117 Las Vegas, NV 89135 T: 702.869.8801 Las Vegas, NV 89117 Tel: 702/872-5555 Fax: 702/872-5545	
11	F: 702.869.2669 <u>jburden@backuslaw.com</u>	
12	Email: <u>smack@blacklobello.law</u> Attorneys for Defendant Attorneys for Plaintiff	
13		
14	<u>ORDER</u>	
15	IT IS SO ORDERED.	
16	DATED: this day of, 2018	
17	Contractor Contractor	
18	UNITED STATES MAGISTRATE JUDGE	
19		
20	DATED this 23 RD day of January, 2018.	
21	Respectfully Submitted,	
	BACKUS, CARRANZA & BURDEN	
22	By: /s/ Jack P. Burden	
23	Jack P. Burden, Esq. 3050 South Durango Drive	
24	Las Vegas, NV 89117 Attorney for Defendant, <i>The Vons Companies, Inc</i>	
25	Anomey for Desendant, The vons Companies, Inc	